

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|--|---|-------------------------------------|
| MARTHA JULIA HIDALGO | : | |
| VILLAFANE, Individually, As Executor | : | Civil Action No.: 2:20-cv-06393-RBS |
| and as Personal Representative of the Estate | : | |
| of Martha Erika Alonso Hidalgo, | : | |
| | : | |
| MA. GUADALUPE NANCY CANALES | : | |
| ELIZALDE, Individually, as Executor and | : | |
| as Personal Representative of the Estate of | : | |
| Marco Antonio Tavera Romero, | : | |
| | : | |
| LOURDES FRANCISCA MENDOZA | : | |
| HERNANDEZ, Individually, as Executor | : | |
| and as Personal Representative of the Estate | : | |
| of Hector Baltazar Mendoza, | : | |
| v. | : | |
| AGUSTAWESTLAND PHILDELPHIA | : | |
| CORPORATION | : | |
| | : | |
| and | : | |
| | : | |
| LEONARDO S.p.A. | : | |

AFFIDAVIT OF JAMES HELKEY

JAMES HELKEY, being duly sworn, deposes and says:

1. I have been employed by defendant AgustaWestland Philadelphia Corporation (“AWPC”), one of the defendants herein, since 2014. I am currently AWPC’s Director, Completions and Maintenance.
2. I have personal knowledge of the facts stated herein, or I obtained such knowledge from records regularly kept by AWPC.
3. I submit this affidavit in support of AWPC’s motion to dismiss pursuant to the doctrine of *forum non conveniens*, and for failure to join a necessary and indispensable party.

4. I understand that the accident which gives rise to this lawsuit involves the crash of an Agusta A109S model helicopter, bearing Mexican Registration No. XA-BON and Serial Number 22174 (the "Subject Helicopter").

5. AWPC does not design or manufacture Agusta A109S model helicopters.

6. AWPC did not design, manufacture, test, assemble, maintain, or overhaul the Subject Helicopter, or any of its component parts.

7. AWPC did not import the Subject Helicopter into Pennsylvania or anywhere else in the United States of America.

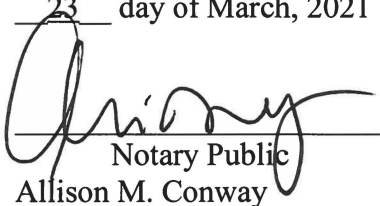
8. AWPC did not sell or distribute the Subject Helicopter from Pennsylvania, or from anywhere else in the United States of America.

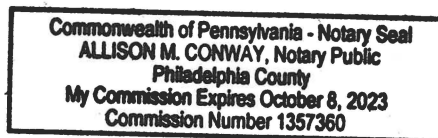
9. The Subject Helicopter has never been flown to or from, and has never been present at, AWPC's facility in Philadelphia.

Dated: March 23, 2021
Philadelphia, Pennsylvania


JAMES HELKEY

Sworn to before me this
23 day of March, 2021


Notary Public
Allison M. Conway



STATE OF Pennsylvania
COUNTY OF Philadelphia } ss.

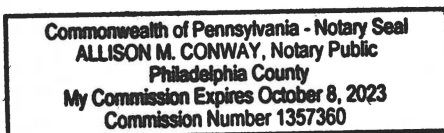
**NOTARIAL CERTIFICATE
OF
ACKNOWLEDGMENT**

On this 23rd day of March, 2021, before me, Allison M. Conway,
Day Month Year Printed Name of Notary Public
the undersigned notary public, personally appeared James Michael Helkey,
Printed Name(s) of Signer(s)

- ☒ personally known to me - or -
☒ proved to me on the basis of satisfactory evidence
 ☐ form(s) of identification Drivers License
 ☐ credible witness(es) _____

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same voluntarily for the purpose expressed therein.

WITNESS my hand and official seal.



Allison M. Conway
Signature of Notary Public